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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF
SYLVIA RIVERA IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S OPPOSITION
TO WAYMO'S MOTION TO
COMPEL FURTHER DISCOVERY
RESPONSES**

Trial Date: October 10, 2017

1 I, Sylvia Rivera, declare as follows:

2 1. I am a partner with the law firm of Morrison & Foerster LLP, counsel of record for
3 Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively "Uber") in this action. I
4 am a member in good standing of the Bar of the State of California. I make this declaration in
5 support of Uber's Opposition to Waymo's Motion to Compel Further Discovery Responses. I
6 have personal knowledge of the facts contained in this declaration and, if called as a witness,
7 could and would testify competently thereto.

8 2. Attached as **Exhibit 1** is a true and correct copy of relevant excerpts of Plaintiff's
9 First Supplemental Objections And Responses To Uber's First Set Of Interrogatories (Nos. 1-11),
10 dated July 13, 2017. **FILED UNDER SEAL**

11 3. Attached as **Exhibit 2** is a true and correct copy of relevant excerpts of Waymo's
12 Cal. Civ. Proc. Code § 2019.210 Trade Secrets List, dated March 10, 2017. **FILED UNDER**
13 **SEAL**

14 4. Attached as **Exhibit 3** is a true and correct copy of a document [REDACTED]
15 [REDACTED] reviously filed under seal at Dkt. 25-20. **FILED UNDER**
16 **SEAL**

17 5. Attached as **Exhibit 4** is a true and correct copy of relevant excerpts of Defendants
18 Uber Technologies, Inc. And Ottomotto LLC's Objections And Responses To Waymo's First Set
19 Of Expedited Requests For Production Pursuant To Paragraph Six Of May 11, 2017 Preliminary
20 Injunction Order (NOS. 1-9), dated June 5, 2017. **FILED UNDER SEAL**

21 6. Attached as **Exhibit 5** is a true and correct copy of relevant excerpts of Defendants
22 Uber Technologies, Inc. And Ottomotto LLC's Responses To Waymo's First Set Of Expedited
23 Interrogatories Pursuant To Paragraph Six Of The May 11, 2017 Preliminary Injunction Order
24 (NOS. 1-9), dated June 5, 2017. **FILED UNDER SEAL**

25 7. Attached as **Exhibit 6** is a true and correct copy of Defendants Uber Technologies,
26 Inc. And Ottomotto LLC's Supplemental Responses To Waymo's First Set Of Expedited
27 Interrogatories Pursuant To Paragraph Six Of The May 11, 2017 Preliminary Injunction Order
28 (Nos. 5, 8), dated June 22, 2017. **FILED UNDER SEAL**

